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13 Attorneys for Plaintiffs DORA SOLARES

14 [Counsel for Defendants on signature page]

15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**

17 DORA SOLARES,

18 Plaintiff,

19 v.

20 RALPH DIAZ, et al.,

21 Defendants.

Case No. 1:20-cv-00323-LHR-BAM

**JOINT REQUEST FOR LEAVE TO TAKE
DEPOSITION OF JAIME OSUNA
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 30(a)(2)(B); AND
ORDER THEREON**

Hon. Lee H. Rosenthal

22 **COME NOW** Plaintiff Dora Solares and Defendants Burnes, Gallemore, Gamboa, Garcia,
23 Loza, Maytubby, Munoz, and Pena and Defendant Silva and hereby submit the following joint
24 request in the above-listed matter. The parties request leave to take the deposition of Jaime Osuna,
25 who is incarcerated at CSP-Corcoran, located at 4001 King Avenue, Corcoran, CA 93212. This
26 request is made pursuant to Federal Rule of Civil Procedure 30(a)(2)(B), which provides that a
27 party must obtain leave of court if the deponent is confined in prison. The deposition of Jaime
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1 Osuna may be taken in person, with remote appearance via videoconference permitted, and the
2 deposition to be recorded by a certified videographer.

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4 Dated: May 22, 2025

LAW OFFICES OF ERIN DARLING

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6 By: /s/
7 Erin Darling,
8 Attorneys for Plaintiff Dora Solares

9 Dated: May 22, 2024

Respectfully submitted,

10 ROB BONTA
11 Attorney General of California
12 JON S. ALLIN
13 Supervising Deputy Attorney General

14 By: /s/
15 JEREMY DUGGAN
16 Deputy Attorney General
17 *Attorneys for Defendants*
18 *Burnes, Pena, Loza, Munoz, Gamboa, and*
19 *Garcia*

20 Dated: May 22, 2024

Respectfully submitted,

ANDRADA & ASSOCIATES

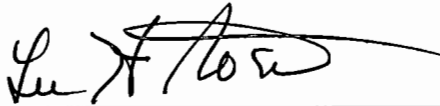
21 By: /s/ Lynne G. Stocker
22 LYNNE G. STOCKER
23 *Attorneys for Defendant Silva*
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1 IT IS HEREBY ORDERED that leave of court for the taking of Jaime Osuna's deposition
2 is GRANTED. The deposition of Jaime Osuna may be taken in person, with remote appearance
3 via videoconference permitted, and the deposition to be recorded by a certified videographer.

4 IT IS SO ORDERED.

5 Dated: June 16,
6 ~~May~~ __, 2025

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9 Lee H. Rosenthal
10 Senior United States District Judge
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